

RECEIVED

MAR 28 '97

EX PARTE OR LATE FILED

## ALA American Library Association

March 27, 1997

Ms Irene Flannery  
Federal Communications Commission  
2100 M. Street  
Washington, DC 20554

Re: Ex Parte Presentation  
CC Docket No: 96-45, Federal-State Joint Board on Universal Service

Dear Ms. Flannery:

In response to our conversation last week regarding the low-income factor for public library discounts, I have some additional information that I believe you should consider in allowing libraries the option of using residential poverty data.

Kendall Wiggin, the New Hampshire State Librarian reports that his state does not keep school lunch statistics by town, but by school, and that there are many towns that have libraries but do not have schools. (These towns send their children to schools in other localities outside the town.) If school lunch is the **only** way to determine low-income discounts for these libraries which other town's school lunch statistics should be used? Some examples of these communities include:

Dummer, NH which sends its children to Milan Village for grades 1-6 and Berlin for grades 7-12.

Easton, NH sends its children to Lafayette Regional for kindergarten through 6th grade and Profile for grades 7-12.

Acworth, NH supports grades 1-4 but sends its children to Walpole for grades 5-8 and Langdon for grades 9-12.

Each of these towns, except for Langdon, has a library. Incidentally, we were able to call the New Hampshire State Librarian and immediately got poverty rates for Dummer, Easton, and Acworth (6.3%, 5.6%, and 7.8% respectively).

A similar situation occurs in Illinois. There the state librarian reports that many Illinois public libraries serve more than one school district. Again, if you restrict library self-certification of the low income discount to school lunch, you will need to provide guidance as to which school district a library should choose in order to arrive at an appropriate discount. In our Reply Comments of January 10, 1997 and our ex parte communication of March 17, 1997 we included information matching a sample of public library facilities with their residential poverty levels. We are currently looking into doing such an analysis for all public library facilities. **ALA maintains that it would be far easier and less burdensome on the libraries -- and on the rules you would need to write -- to simply allow libraries the option of self-certifying the degree of residential poverty in their service area based on the most current U.S. Census data available.**

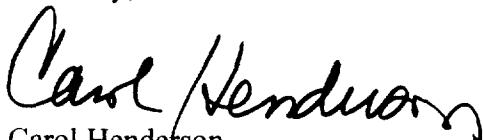
As we have stated in prior filings, poverty rates better relate to the communities libraries serve. School lunch eligibility counts families with children in school and does not reflect families or households in poverty which do not have school age children. Even where school districts and library service areas are roughly similar, the use of school lunch to determine the low income discount could deprive libraries of the full discount to which they were entitled. In Adair County, Missouri for example, 42% of their children are eligible for school lunch, 23.8% of the residents are in poverty. In the ALA filings of January 10 and March 17 ALA provided discount tables based on a sample of residential poverty information matched to public library facilities. The distribution in ALA's table matches the distribution of discounts in the Joint Board Recommendation. Using the Adair County data against these tables, the Adair County Public Library would receive a 65% discount under school lunch and a 90% discount using the residential poverty measure assuming that high cost was not a factor in the area. For Kansas City with a 22.4% poverty rate and 72.77% school lunch participation, the library discount would be 90% under a poverty level measure, 80% under school lunch; for Knox County with a 22.7% poverty rate and 45.06% school lunch participation, the discount would be 90% under our poverty level table, 65% under school lunch; for Putnam County with 19.9% poverty rate and 38.55% school lunch participation the discounts would be 80% under our poverty level table, 65% under school lunch.

It is important to reiterate that the ALA sample table does have the same distribution of discounts as the Joint Board Recommendation and that the Missouri data was received subsequent to the construction of the sample table. Undoubtedly, there will be public libraries for whom school lunch eligibility will be a sufficient measure for calculating the appropriate discount rate. However, as noted above, **restricting library self-certification of the discount only to school lunch eligibility poses problems for libraries whose service areas do not encompass a school, serve multiple schools, or for whom the use of a school lunch measure would result in serious discrepancies in the discount received.** For these reasons, ALA again urges the FCC to allow libraries the **option** of self-certifying its low-income discount based on the most current residential poverty level available.

March 27, 1997  
ALA 96-45 Page 3

Please feel free to contact me, Andrew Magpantay, or Lynne Bradley if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Carol Henderson". The signature is written in a cursive, flowing style with a large initial "C" and a long, sweeping underline.

Carol Henderson  
Executive Director  
Washington Office  
American Library Association

CC: Mr. William F. Caton